

SUPPLEMENTAL BASIS STATEMENT

Chapter 100 Definitions Regulation Amendments of August 20, 2009

List of Commenters

- (1) Anne Arnold
United States Environmental Protection Agency
Region 1
1 Congress Street, Suite 1100
Boston, MA 02114-2023
- (2) David Darling, P.E.
Director, Environmental Affairs
National Paint & Coatings Association, INC.
1500 Rhode Island Avenue N.W.
Washington, DC 20005

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1) The proposed amendments to Chapter 100 are consistent with EPA's VOC definition in the Code of Federal regulations at 40 CFR Part 51.100(s). (1) (2)

The Department would like to thank the commenters for their support.

2) Dimethyl Carbonate and to a lesser extent Propylene Carbonate may be useful in the formulation of paints and coatings. If exempted, there may be an incentive for industry to use these negligibly reactive compounds in place of more highly reactive compounds that are regulated as VOCs. Further, this exemption may provide more options for the industry in meeting the stringent VOC limits found in Maine's Architectural and Industrial Coatings regulation. (2)

The Department recognizes that this rulemaking may provide an increased opportunity for paint and coatings manufacturers to substitute negligibly-reactive solvents in place of more reactive compounds in their product formulations. We believe that the increased use of exempt solvents should help the paint and coatings industry meet not only current emission limits as contained in Maine's Chapter 151 Architectural and Industrial Maintenance Coatings rule, but also more stringent limits that have been adopted or are under consideration in other jurisdictions.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

July 28, 2009

Jeff Crawford
Bureau of Air Quality
Maine Department of Environmental Protection
State House, Station No. 17
Augusta, ME 04333

Dear Mr. Crawford:

Thank you for the opportunity to review the proposed revisions to Maine's Chapter 100, "Definitions of Air Pollution Control Regulations," developed by the Maine Department of Environmental Protection (DEP).

We have reviewed the revised rule which proposes to amend the definition of volatile organic compound (VOC), and found that it is consistent with EPA's VOC definition in the Code of Federal Regulations at 40 CFR Part 51.100(s). We have no further comments at this time.

If you have any questions regarding this matter, please contact Ariel Garcia of my staff at 617-918-1660.

Sincerely,

A handwritten signature in cursive script, reading "Anne Arnold", is positioned above the typed name.

Anne Arnold, Manager
Air Quality Planning Unit

NPCA | FSCT

June 13, 2009

Mr. Jeff Crawford
Bureau of Air Quality Control
Department of Environmental Protection
17 State House Station
Augusta, Maine 04333

RE: Proposed Amended Rule 100; NPCA Comments

Dear Mr. Crawford:

The National Paint and Coatings Association ("NPCA")¹ supports the proposed amendment of Rule 100 to add dimethyl carbonate, and propylene carbonate to the rule's definition of "Exempt Compound." This amendment would be consistent with U.S. EPA's January 2009 action to delist these compounds from the federal definition of VOC, based on their negligible photochemical reactivity

Dimethyl Carbonate and to a lesser degree Propylene Carbonate may be useful in the formulation of paints, and coatings. If exempted, there may be an incentive for industry to use these negligibly reactive compounds in place of more highly reactive compounds that are regulated as VOCs. Further, this exemption may provide more options for the industry in meeting the stringent VOC limits found in Maine's Architectural and Industrial Maintenance Coatings regulation.

In advance, thank you for your consideration of our comments. Please do not hesitate to contact me for additional information or if you have questions.

Sincerely,



David Darling, P.E.
Director, Environmental Affairs

*** Sent via email***

¹ NPCA is a voluntary, nonprofit trade association representing some 350 manufacturers of paints, coatings, adhesives, sealants, and caulks, raw materials suppliers to the industry, and product distributors. As the preeminent organization representing the coatings industry in the United States, NPCA's primary role is to serve as ally and advocate on legislative, regulatory and judicial issues at the federal, state, and local levels. In addition, NPCA provides members with such services as research and technical information, statistical management information, legal guidance, and community service project support.